

AFFIDAVIT

I, May Chow, being duly sworn, state the following:

1. I am a Special Agent with the US Secret Service assigned to the Burlington Resident Agency. I have been employed as a Special Agent since June 1998. I have conducted numerous investigations into persons engaging in offenses involving the manufacturing, possession and distribution of counterfeit US currency. I have received extensive training regarding the technical features of genuine currency, the detection of counterfeit currency, and the methods of operation used by counterfeiters.
2. I am aware of facts that give me probable cause to believe that Dianna Arseneault knowingly passed and attempted to pass counterfeit obligations of the United States with the intent to defraud, in violation of Title 18 U.S.C § 472. This affidavit is based upon my own personal knowledge and upon information received from other individuals. This affidavit is meant to set forth probable cause and does not include every fact known to law enforcement about the events described below.
3. On 7/22/19, Officer Jennifer Cousins, Burlington Police Department, Burlington, VT, advised me that a complaint was received from the Burlington Asian Market that a male and female were attempting to make an RIA¹ money transfer in the amount of \$4800 in counterfeit US currency to Guiseppe Macri, Montreal QC. According, to Officer Cousins, an employee at the Burlington Asian Market recognized Arseneault from a previous RIA money transfer transaction that occurred on 6/1/19. A copy of the July 22, 2019 RIA money transfer and a copy of the Canadian passport for Arseneault were provided to Officer Cousins who verified that Arseneault

¹ According to the company's website, RIA offers money transfers and related services through over 377,000 locations in 149 countries. See <https://www.riamoneytransfer.com/us/en/about-ria>

and the male, later identified as Guiseppe Macri, were the individuals responsible for the previous money transfer and for the current attempt on 7/22/19.

4. In addition to the documents provided by Burlington Asian Market, Officer Cousins advised that the male that was accompanying Arseneault fled the business in a brown 2007 Toyota Camry with Quebec registration W34HKT. Officer Cousins advised that a bulletin had issued for the vehicle and for the occupant.

5. On 7/22/19, Customs and Border Protection Officer Nicole Moreno advised that the Toyota Camry, operated by Guiseppe Macri, entered Canada at approximately 1221 hours that same day.

6. Officer Cousins further advised that Arseneault was interviewed on site at the Burlington Asian Market. According to Officer Cousins, Arseneault changed her statement multiple times regarding her involvement with the counterfeit US currency.

7. On 7/22/19, Sergeant Nadeau, Burlington Police Department, Burlington, VT, provided me with a snapshot of the front of several of the apparent counterfeit notes seized from Arseneault. Using that image, I entered the denomination and serial number on the front of each note into the U.S. Secret Service's Counterfeit Tracking System.² From the information entered, the Counterfeit Tracking System identified several of the provided notes as counterfeit. Further, the Counterfeit Tracking System indicated that bills with the same denominations and serial numbers had been reported (and later deemed counterfeit) following Arseneault's RIA transfer in June 2019. Additionally, in discussions with responding law enforcement officers, I confirmed the bills had other indicia of being counterfeit, specifically, the blue 3-D security ribbon on the \$100 note

² The Counterfeit Tracking System is an application that manages data regarding reported and confirmed counterfeit notes. It does not contain every counterfeit note produced, but rather, those notes reported to U.S. Secret Service that were determined by the agency to be counterfeit.

appeared to be taped on a few of the bills, the watermark did not resemble Benjamin Franklin, and the paper felt odd.

8. On 7/22/19, I interviewed Arseneault who was advised of her constitutional rights under *Miranda* which she acknowledged and verbally waived. According to Arseneault, she met Macri via an online dating site approximately a year ago. Arseneault stated that Macri asked her to accompany him to the US to send money to himself in Canada for a better exchange rate. Arseneault advised that she has driven Macri's vehicle on two occasions to send US money via RIA money transfer services. Arseneault acknowledged that she was responsible for sending a RIA wire transfer to Macri on 6/1/19 from the Burlington Asian Market. Arseneault explained that on 7/22/19, she and Macri drove up to the Burlington Asian Market and Macri handed her the currency in an envelope. She then took the money out of the envelope to give to the clerk. She claimed she did not know the money was counterfeit. Arseneault also advised that she received \$500 in Canadian currency for wiring the money on 6/1/19 to Macri and was to receive the same for her involvement on July 22, 2019 before she was arrested by the Burlington Police Department. Arseneault did not mention her attempt to send money from the Nepali Dumpling House on 7/20/19 (discussed below) during the interview.

9. On 7/22/19, Foreign Service National (FSN)³ Sima Ghafghaichi, USSS Montreal, advised that Arseneault and Macri are not of record for any Canadian or US criminal involvements.

10. On 7/22/19, Officer Durwin Ellerman, Burlington Police Department, advised that on 7/20/19 he responded to a complaint from the Nepali Dumpling House for the passing of counterfeit US currency. According to Officer Ellerman, Macri and Arseneault were at the Nepali

³ Foreign Service Nationals are investigators that are paid by the U.S. State Department but who work to support the USSS in a foreign country with investigations and protection

Dumpling House attempting to send an RIA wire transfer in the amount of \$3000 to Macri in Montreal. Officer Ellerman stated that the Nepali Dumpling House had advised Arseneault that the money was counterfeit, and by the time he had arrived on scene, Arseneault and Macri had departed with the counterfeit US currency. Officer Ellerman received a copy of the receipt for the unexecuted transfer from the Nepali Dumpling House which listed the sender as Arseneault and the recipient as Macri. Nepali Dumpling house employees further provided a description of a vehicle matching Macri's Toyota Camry.

11. On 7/23/19, FSN Ghafghaichi provided the border crossing history for Macri and Arseneault. The crossings for Macri and Arseneault corresponded with the 6/1, 7/20, and 7/22 dates of the reports of attempted use of counterfeit US currency to the Burlington Police Department.

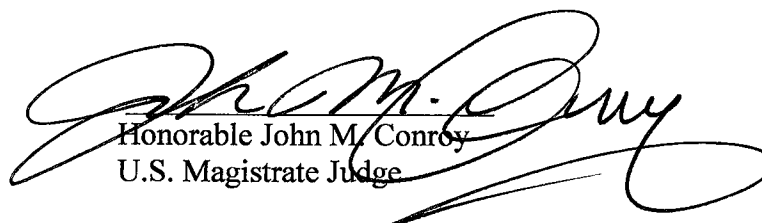
12. On 7/23/19, I examined all suspected counterfeit US currency from the July 22, 2019 incident, totaling \$4800, and based on my training and experience identified the bills as counterfeit and identified that all suspected bills were produced using offset printing methods. I noted that the bills were not printed on the correct type of paper (U.S. currency is printed on paper manufactured by a specific company which contains a mix of 25% linen and 25% cotton with randomly disbursed red and blue security fiber). The paper in the presented notes was too thick and lacked these red and blue fibers. Further, the watermark resembled Santa Claus rather than Benjamin Franklin and the security threads did not glow when held up to ultraviolet light. All of these factors are indicia of counterfeiting. Offset printing methods involve a traditional printing process where the image is transferred to the paper. The counterfeit US currency that is of record in the USSS Counterfeit Tracking System are classified to a traditionally printed counterfeit Federal Reserve Note which has a common combination of identifiers, such as front plate, back plate, series, and quadrant.

13. Based on the information set forth above, I believe there is probable cause to find that Dianna Arseneault knowingly passed and attempted to pass counterfeit currency on July 22, 2019.



May Chow
Special Agent

Sworn and subscribed to before me at Burlington, Vermont on this ^{7th} day of August, 2019.



Honorable John M. Conroy
U.S. Magistrate Judge